

(MMH)

## PROPOSED DISCOVERY PLAN/SCHEDULING ORDER

	<b>DONE</b>	<b>NOT APPLICABLE</b>	<b>DATE</b>
<b>A. ACTIONS REQUIRED <u>BEFORE</u> THE INITIAL CONFERENCE</b>			
1. Rule 26(f) Conference held	x		4/19/2022
2. Rule 26(a)(1) disclosures exchanged			4/27/2022
3. Requested:			
a. Medical records authorization		x	
b. CPL § 160.50 releases for arrest records		x	
c. Identification of John Doe/Jane Doe defendants		x	
4. Procedures for producing Electronically Stored Information (ESI) discussed		x	
5. Protective Order to be submitted for court approval (see Standing Protective Order on the Chambers website)		x	
<b>B. SETTLEMENT PLAN</b>			
1. Plaintiff to make settlement demand	x		2/7/2022
2. Defendant to make settlement offer	x		3/11/2022
3. Referral to EDNY mediation program pursuant to Local Rule 83.8? (If yes, enter date for mediation to be completed)	x		6/27/2022
4. Settlement Conference (proposed date)			on or before 6/27/2022
<b>C. PROPOSED DEADLINES</b>			
1. Motion to join new parties			6/27/2022
2. Motion to amend pleadings			6/27/2022
3. Initial documents requests and interrogatories			8/24/2022
4. All fact discovery to be completed (including disclosure of medical records)			10/23/2022
5. Joint status report certifying close of fact discovery and indicating whether expert discovery is needed			10/23/2022

6. Expert discovery (only if needed)		<i>Check here if not applicable</i> <input checked="" type="checkbox"/>			
Plaintiff expert proposed field(s) of expertise:	N/A				
Defendant expert proposed field(s) of expertise:	N/A				
	<b>DONE</b>	<b>NOT APPLICABLE</b>	<b>DATE</b>		
a. Affirmative expert reports due		N/A			
b. Rebuttal expert reports due		N/A			
c. Depositions of experts to be completed		N/A			
7. Completion of ALL DISCOVERY (if different from C.4)		N/A			
8. Joint status report certifying close of ALL DISCOVERY and indicating whether dispositive motion is anticipated		10/23/2022			
9. If any party seeks a <b>dispositive motion</b> , date to a. file request for pre-motion conference (if required), or b. file briefing schedule for the motion		11/7/2022			
10. Proposed Joint Pre-Trial Order due (if no dispositive motion filed)		12/22/2022			

**D. CONSENT TO MAGISTRATE JUDGE JURISDICTION**

1. All parties consent to Magistrate Judge jurisdiction for dispositive motions?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
2. All parties consent to Magistrate Judge jurisdiction for trial?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

**E. COLLECTIVE ACTION AND CLASS ACTION MOTIONS ONLY**

1. Motion for collective action certification in FLSA cases		n/a	
a. Response due			
b. Reply due			
2. Motion for Rule 23 class certification		n/a	
a. Response due			
b. Reply due			

**This Scheduling Order may be altered or amended only upon a showing of good cause based on circumstances not foreseeable as of the date of this order.**

SO ORDERED:

/s/ Marcia M. Henry

**MARICIA M. HENRY**

United States Magistrate Judge

07/29/2022

**Date**